

Jeffrey L. Tarkenton (VSB No. 20631)
Womble Bond Dickinson (US) LLP
1200 Nineteenth Street, N.W.
Suite 500
Washington, DC 20036
(202) 857-4450 – Telephone
(202) 261-0050 – Facsimile

*Counsel for Wells Fargo Bank, N.A., d/b/a Wells
Fargo Home Mortgage, in its capacity as servicer
for HSBC Bank USA, National Association, as
Trustee for Nomura Asset Acceptance
Corporation, Mortgage Pass-Through Certificates,
Series 2005-AR6*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE:)	
)	
ALICE THOMAS,)	Bankruptcy Case No. 18-12376 KHK
)	
Debtor.)	Chapter 13
)	
<hr/> ALICE THOMAS,)	
)	
Plaintiff,)	
)	
v.)	Adv. Pro. No. 18-01093 KHK
)	
SAMUEL I. WHITE, PC, et al.,)	
)	
Defendants.)	
<hr/>)	

MOTION TO ESTABLISH DISCOVERY PLAN

Defendant Wells Fargo Bank, N.A., d/b/a Wells Fargo Home Mortgage (“Wells Fargo”), in its capacity as servicer for HSBC Bank USA, National Association, as Trustee for Nomura Asset Acceptance Corporation, Mortgage Pass-Through Certificates, Series 2005-AR6, respectfully requests that the Court set the following deadlines for the Discovery Plan in this case:

Event	Deadline
Initial Disclosures	December 21, 2018
Expert Witness Disclosures	December 21, 2018
Rebuttal Expert Witness Disclosures	January 2, 2019
Discovery Deadline	February 21, 2019
Final Pretrial Conference	tbd

Wells Fargo moves the Court to set this alternative discovery plan because the Motions to Dismiss filed by both Wells Fargo and Samuel I. White, P.C. are scheduled to be heard on November 6, 2018. The resolution of these motions may avoid the need for the parties to engage in discovery.

Counsel for Samuel I. White PC has stated that Samuel I. White, PC agrees to the proposed discovery plan. Undersigned counsel has attempted to contact Ms. Thomas regarding the proposed discovery plan, but as of the time of this filing, she has not responded.

WHEREFORE, Wells Fargo respectfully requests that the Court enter an Order approving the discovery plan set forth above.

Dated: October 23, 2018

Respectfully submitted,

/s/ Jeffrey L. Tarkenton

Jeffrey L. Tarkenton (VSB No. 20631)

Pascal F. Naples (VSB No. 87849)

Womble Bond Dickinson (US) LLP

1200 Nineteenth Street, N.W.

Suite 500

Washington, DC 20036

Tel: (202) 857-4450

Fax: (202) 261-0050

Email: Jeffrey.Tarkenton@wbd-us.com

Email: Pascal.Naples@wbd-us.com

*Counsel for Wells Fargo Bank, N.A., d/b/a Wells
Fargo Home Mortgage, in its capacity as
servicer for HSBC Bank USA, National
Association, as Trustee for Nomura Asset
Acceptance Corporation, Mortgage Pass-
Through Certificates, Series 2005-AR6*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 23rd day of October, 2018, a copy of the foregoing Motion to Establish Discovery Plan was served via the Court's CM/ECF system upon all counsel of record and by first class, U.S. mail, postage prepaid, upon the following:

Alice Thomas
6516 River Tweed Lane
Alexandria, VA 22312

/s/ Jeffrey L. Tarkenton
Jeffrey L. Tarkenton